

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHARLES RICHARDS and JAY GEYWITS,
Individually and on Behalf of All Others Similarly
Situated, as Class Representatives,

07 CV 3350 (SAS)(DCF)

STIPULATION
OF CONFIDENTIALITY

Plaintiffs,

-against-

LANG INDUSTRIES, INC., WORLD CLASS ON SITE
MANAGEMENT, LCC, and LANG WASTE SERVICES
CORP.,

Defendants.

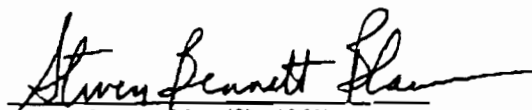
IT IS HEREBY AGREED AND STIPULATED, by and between counsel for the parties in the above-captioned matter, that except for disclosures to counsel and their support staff including expert witnesses for purposes relating strictly to the prosecution or defense of this litigation, documents obtained by either party from any source whatsoever including third parties or in discovery which contain personal information, including but not limited to social security numbers and home addresses, regarding individuals who are not parties to this lawsuit shall not be disclosed to any person or entity including the parties to this litigation, unless opposing counsel specifically consents in writing to such a disclosure. If a disagreement arises concerning the disclosure of such information, the party seeking to make the disclosure shall obtain approval from this Court prior to making such disclosure. This procedure shall also apply if counsel wishes to use any protected information such as social security numbers or home addresses of individuals who are not parties to this lawsuit or social security numbers of any individual including parties to this lawsuit in support or opposition of any motions. Counsel for the party wishing to use such protected information shall seek the written consent of opposing counsel.

The opposing party through counsel shall have five (5) working days to file a written objection. The parties shall then use good faith efforts to work out a resolution including but not limited to redacting the protected information. If the parties through counsel cannot agree to a resolution, the party wishing to use the protected information shall obtain approval from this Court prior to such use.

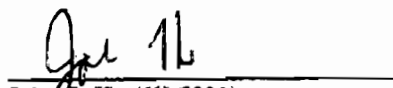
IT IS FURTHER AGREED AND STIPULATED, that counsel for the Plaintiffs shall not disclosure Ned Lang's social security number to any person or entity including parties to this litigation except as specifically authorized in the paragraph above.

IT IS FURTHER AGREED AND STIPULATED, that counsel for the parties hereby represent that they have not made any such disclosures of documents or information protected by this Stipulation of Confidentiality ("Stipulation") to any person or entity except their support staff at any time prior to the execution of the Stipulation except for protected information held by either party in the ordinary course of business.

So Stipulated:



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SO ORDERED:



The Hon. Shira A. Scheindlin, U.S.D.J.

Dated: 2/26/08